

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CG3 MEDIA, LLC and COREY
GRIFFIN,

Plaintiffs / Counter-Defendants,

-v-

BELLEAU TECHNOLOGIES, LLC,

Defendant / Counter-Plaintiff.

Civil Action No. 1:21-cv-04607-MKV

JOINT CLAIM TERMS CHART

Pursuant to the Court's Scheduling Order (Dkt. 15) and Local Patent Rule 11, the parties jointly submit the attached Joint Claim Terms Chart for U.S. Patent No. 9,953,646 in the above-captioned matter.

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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, I served the foregoing Joint Claim Terms Chart on counsel of record via ECF and pursuant to Federal and local rules.

/s/ Etai Lahav
Etai Lahav

Exhibit A

I. Agreed Upon Terms

Term #	Terms	Exemplary Claim Number(s)	Agreed Proposed Construction
1	“plurality of hypothesis words” / “said hypothesis words” / “said plurality of hypothesis words”	6	“two or more hypothesis words”

II. Disputed Terms

Term #	Terms	Exemplary Claim Number(s)	Belleau’s Proposed Construction¹	CG3’s Proposed Construction
2	“a processor”	1	One or more computing devices, used either alone or in combination, where the computing devices include, without limitation, processors, microprocessors, general purpose processors, conventional processors, digital signal processors, controllers, microcontrollers, or state machines.	Plain and ordinary meaning

¹ The claims asserted by Belleau and the products against which they are asserted are identified on page 1 of Belleau’s October 8, 2021 Disclosure of Asserted Claims and Infringement Contentions.

Term #	Terms	Exemplary Claim Number(s)	Belleau's Proposed Construction¹	CG3's Proposed Construction
3	"a memory device of a computer"	1	One or more memory devices that are accessible to one or more computers	Plain and ordinary meaning
4	"text file"	1	Plain and ordinary meaning	"a collection of data that is treated as a unit by a file system"
5	"hypothesis words"	1	Plain and ordinary meaning ²	Indefinite
6	"altering, via said processor, said predetermined number of artifact words utilized for comparing to said predetermined number of hypothesis words"	1	Plain and ordinary meaning	Indefinite
7	"storing, via a processor...retrieving, via said processor...generating, via said processor...compa	1	Plain and ordinary meaning	One or more processors, at least one of which must implement the "storing"; "retrieving"; "generating"; "comparing"; "altering"; "determining"; "determining"; and "altering" functions.

² As CG3 has not yet articulated its specific reasoning for why it alleges "hypothesis words" and "altering, via said processor..." are indefinite, Belleau reserves the right to offer a construction that addresses CG3's specific indefiniteness arguments once those arguments are disclosed.

Term #	Terms	Exemplary Claim Number(s)	Belleau's Proposed Construction ¹	CG3's Proposed Construction
	ring, via said processor...altering, via said processor...determining, via said processor...determining, via said processor...altering, via said processor."			
8	"storing...in a memory device of a computer...displaying...on the display screen of said computer"	1	Plain and ordinary meaning	Wherein the "storing...said text artifact"; "displaying said text artifact"; and "displaying...said match location" must all occur on the same computer.